

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

EXPERIMENTAL PREMIUM  
FORWARDING SERVICE

Docket No. MC2005-1

PARTIAL OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORY OCA/USPS-T4-23  
OF THE OFFICE OF THE CONSUMER ADVOCATE  
(February 7, 2005)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby objects in part to interrogatory OCA/USPS-T4-23 of the Office of the Consumer Advocate, filed on January 27, 2005. Interrogatory OCA/USPS-T4-23 asks for extensive information about the Postal Service's systems for tracking complaints about its products and services. The Postal Service objects on the grounds of relevance, overbreadth, and burden. The interrogatory states:

**OCA/USPS-T4-23.** Please refer to your testimony, Attachment A, the "MC2005-1 Data Collection Plan," and your response to OCA/USPS-T4-15, where it states, "Some complaints would end up in the existing system for collecting, analyzing and responding to customer complaints that is overseen by the Postal Service's Consumer Advocate."

- (a) Please describe "the existing system," including the organizational relationship between any component parts, such as the Consumer Advocate at postal headquarters, the USPS Call Center, the "email Us" at [http://hdusps.esecurecare.net/cgi-bin/hdusps.cfg/php/enduser/ask.php?sid=IXcRMAwh&p\\_lva=](http://hdusps.esecurecare.net/cgi-bin/hdusps.cfg/php/enduser/ask.php?sid=IXcRMAwh&p_lva=) on the Postal Service's website, and consumer affairs managers and officials in field/district/local facilities and offices.
- (b) Please explain the process by which consumer complaints are collected, analyzed and responded to under "the existing system," and any component parts described in subpart (a), above. Will this process be applicable to PFS customer complaints? Please explain.
- (c) Please identify and describe the types of information or data collected from customer complaints by "the existing system," and any component

- parts described in subpart (a), above. Will the same or similar types of information or data be collected from PFS customer complaints? Please explain.
- (d) Please describe and explain in what form the information and data collected from customer complaints under “the existing system,” and any component parts described in subpart (a) above, are recorded, organized, managed and maintained. Will the information and data collected from PFS customer complaints be recorded, organized, managed and maintained in the same form? Please explain.
- (i) Please explain how persons collecting information and data under “the existing system” generally, and for PFS customer complaints, would record such information and data. Provide examples of physical and electronic forms or pages used.
- (ii) Please explain in what form the information or data at the time of collection is recorded under “the existing system” generally, and for PFS customer complaints, i.e., in narrative or text form, or grouped or categorized, etc.
- (iii) Please provide the name of each program or data base in which the information and data collected under “the existing system” is recorded, organized, managed and maintained, and the relationship between each program and data base.
- (iv) Please explain whether each program and data base is “searchable” so as to permit research by specific class of mail, problem, etc., including PFS, if recommended and approved.
- (v) Please explain how long information and data that is collected and recorded in electronic form are retained under “the existing system.” Specifically, how long would customer complaint information and data collected in FY 2004 be retained by “the existing system?”
- (e) Please identify and describe the types of reports, summaries, or other compilations that are routinely generated under “the existing system?” Will the same or similar types of reports, summaries, or other compilations based on PFS customer complaints be generated under “the existing system?” Please explain.
- (f) Please identify and describe the types of information that are made public with respect to customer complaints under “the existing system?” Will the same or similar types of information be made public with respect to PFS customer complaints under “the existing system?” Please explain.

The Postal Service has an organizational unit called the Consumer Advocate, which operates a system for the collection, aggregation, and reporting of customer complaints for two related sets of reasons. One is to be responsive to customers by listening to them, analyzing reported problems, and attempting to solve them. The other

is the business goal of learning how well a service is meeting customer needs. In the context of the proposed experiment for Premium Forwarding Service, analyzing customer complaints helps the Postal Service determine how well the experiment is working, how customers are reacting including their likes and dislikes, and what modifications or improvements should be considered for a permanent form of the service.

The proposed PFS experiment is fairly straightforward, in a classification sense, with the data the Postal Service most needs to evaluate the success of the service identified in the Data Collection Plan, Attachment A to USPS-T-4. The two most important pieces of information not already available are how much PFS packages weigh, and how many zones they travel.

This docket is proceeding under the Commission's rules for proposed experiments, Rules 67 through 67d. Tr. 1/5. These rules contemplate comparatively quick consideration by the Commission, aided by the limitation of issues. Order No. 1425, at 5, directed participants to identify any genuine issues of material fact, and none was so identified.

Interrogatory OCA/USPS-T4-23, by contrast, goes far beyond the scope of this proceeding by asking for in-depth documentation of the Consumer Advocate's system for processing complaints, extending even to filenames, fielded searches, and types and names of reports.

The team presenting the limited PFS request to the Commission has now explored how PFS might be picked up in the Consumer Advocate's system. We have learned a great deal, including how much we still do not know about the system and

how it could or would provide information regarding PFS. The Postal Service does not, however, believe that such information is relevant to this experimental docket.<sup>1</sup>

However, providing a full set of answers to all of the OCA's questions will easily take weeks of effort and would be premature at this time. Only if and when the Postal Service gains approval for a PFS experiment from the Commission, as well as its own Governors, will some of OCA's questions even become ripe. It makes little sense to plan out details on how information can or should be collected until the need has been demonstrated.

The PFS team has, however, gained new knowledge regarding the Consumer Advocate's system. Members of this team, moreover, expect to be active in the management of PFS if it is implemented, so this time has not been purely wasteful. The Postal Service accordingly agrees to answer the myriad questions embodied in interrogatory OCA/USPS-T4-23 to the extent it can regarding its interaction with an experimental form of PFS. At the same time, the Postal Service objects to provision of the excessive, irrelevant, overbroad, and burdensome details sought by the OCA which would add extraneous material to the record that is not needed for consideration of the PFS proposal.

This approach worked well in witness Cobb's response to David B. Popkin's interrogatory DBP/USPS-T1-51. That interrogatory asked for a variety of information about Postal Service procedures for temporary and permanent forwarding. The Postal Service responded by discussing those procedures to the extent they affect PFS, but objected to providing the more general information requested in the interrogatory. The

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<sup>1</sup> As a general matter, however, such details may be relevant to a subsequent request for permanent authorization.

Presiding Officer denied David B. Popkin's motion to compel a more complete response to the interrogatory. Presiding Officer's Ruling No. 1/MC2005-1 (January 26, 2005).

The Postal Service therefore objects to interrogatory OCA/USPS-T4-23, in part, on the grounds of relevance, overbreadth and burden.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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/s/ \_\_\_\_\_  
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